RAILROAD COMMISSION OF TEXAS HEARINGS DIVISION

OIL & GAS DOCKET NO. 20-0294179

IN RE: P-5 ORGANIZATION REPORT OF LANDRICK O & G OPERATING, LLC

FINAL ORDER

The Commission finds that after notice and an opportunity for hearing regarding the captioned matter, the Operator failed to request a hearing and pay the hearing fee as required by 16 Tex. ADMIN. CODE §3.15(g)(4) and Tex. Nat. Res. Code §89.022(f). This matter having been duly submitted to the Railroad Commission of Texas at conference held in its offices in Austin, Texas, the Commission makes the following findings of fact and conclusions of law.

FINDINGS OF FACT

- 1. Landrick O & G Operating, LLC [Operator #484697] (the "Operator"), is the record operator or one or more inactive wells in the State of Texas and is required to file Organization Report (Form P-5) with the Commission. Operator's most recent P-5 was due on or before July 1, 2014.
- 2. After filing its most recent Organization Report (Form P-5) with the Commission, the Operator was notified they were deficient and had failed to comply with the requirements of 16 Tex. Admin. Code § 3.15 (Surface Equipment Removal Requirements and Inactive Wells) and provided with a written statement of the reasons for the determination and allowed ninety (90) days from the date its P-5 was due to comply with the requirements of 16 Tex. Admin. Code § 3.15 and Tex. Nat. Res. Code §§89.021 89.030.
- 3. After the expiration of ninety (90) days and pursuant to 16 Tex. ADMIN CODE §3.15(g)(4), an authorized Commission employee determined that the Operator's Organization Report still could not be renewed because the Operator continued to fail to comply with the requirements of 16 Tex. ADMIN. CODE §3.15 (Surface Equipment Removal Requirements and Inactive Wells).
- 4. The Commission sent the Operator a letter by certified mail giving notice to the Operator of the determination of continued non-compliance regarding specified inactive wells, attached as Exhibit A to this order, and advising the Operator of the right to request a hearing to show compliance. The letter notified the Operator that the hearing request must be received in docket services no later than 30 days after the date of the letter. The letter also notified the Operator that a final order denying renewal of the Operator's Organization Report (Form P-5) would result in the cancellation of all P-4 Certificates of Compliance and the severance of all pipeline or other carrier connections.

- 5. All notices and letters from the Commission to the Operator on this matter were addressed and mailed to the Operator's most recently reported address on the Form P-5 Organization Report.
- 6. The Operator did not timely request a hearing and pay the hearing fee on these issues as required under 16 Tex. ADMIN. CODE §3.15(g)(4) (Surface Equipment Removal Requirements and Inactive Wells).
- 7. Statewide Rule 15 (16 Tex. ADMIN. CODE §3.15) is a Commission rule that relates to safety or the prevention or control of pollution.

CONCLUSIONS OF LAW

- 1. The Operator received proper notice and an opportunity for hearing regarding compliance with 16 Tex. Admin. Code §3.15 and Tex. Nat. Res. Code §§89.021 89.030.
- 2. All things necessary to the Commission attaining jurisdiction over the subject matter and the parties in this matter have been performed or have occurred.
- 3. The Operator is in violation of Commission Statewide Rule 15 and did not timely request a hearing to contest the determination that it was in violation.
- 4. The Operator's P-5 Organization Report should not be renewed and all of the Operator's P-4 Certificates of Compliance should be cancelled, with all related pipeline or other carrier connections severed. 16 Tex. Admin. Code §3.15 (g)(4) and Tex. Nat. Res. Code §§89.022(f), 91.704 91.706.
- 5. The Operator's P-5 Organization Report cannot be renewed until the operator brings the inactive wells shown on the attached Exhibit A into compliance with the requirements of 16 Tex. Admin. Code §3.15 and Tex. Nat. Res. Code §889.021 89.030.

IT IS ORDERED that renewal of Landrick O & G Operating, LLC's P-5 Organization Report is hereby **DENIED**.

It is further ORDERED that all P-4 Certificates of Compliance issued to Landrick O & G Operating, LLC as operator of record are hereby CANCELLED and all related pipeline or other carrier connections are hereby SEVERED.

It is further ORDERED that Landrick O & G Operating, LLC shall bring the wells on Exhibit A into compliance with Statewide Rule 15 (16 Tex. ADMIN. CODE §3.15) and that the Operator's P-5 Organization Report shall not be renewed until the wells on Exhibit A have been brought into compliance as required by this order.

It is further ORDERED that Landrick O & G Operating, LLC and each person who held a position of ownership or control in the Operator at the time the Operator's most-recent P-5 Organization Report was filed shall be subject to the terms of Tex. Nat. Res. Code §91.114.

It is further ORDERED by the Commission that this order shall not be final and effective until 20 days after a party is notified of the Commission's order. A party is presumed to have been notified of the Commission's order three days after the date on which the notice is actually mailed. If a timely motion for rehearing is filed by any party at interest, this order shall not become final and effective until such motion is overruled, or if such motion is granted, this order shall be subject to further action by the Commission. Pursuant to Tex. Gov't. Code §2001.146(e), the time allotted for Commission action on a motion for rehearing in this case prior to its being overruled by operation of law, is hereby extended until 90 days from the date the parties are notified of the order.

All requested Findings of Fact and Conclusions of Law which are not expressly adopted herein are **DENIED**. All pending motions and request for relief not previously granted or granted herein are **DENIED**.

RAILROAD COMMISSION OF TEXAS

(Signatures affixed by Rule 15 Inactive Well Master Order dated December 9, 2014.)

1

| API | Number D | istrict | ID Number | Lease Name | Well Number |
|-----|---|-------------------------|---------------|--|--------------|
| 105 | Electricit | y must be fluids m | disconnecte | SHANNON -A- d (certify on Form W-3C) d (certify on Form W-3C) | 17 |
| 105 | 00498 No approve | | 07087 file | SHANNON, J. MB- | 7 |
| 105 | 00499 No approve | 7C d W-3X on | 02051 file | SHANNON, J. M. ESTATE -A- | 8 |
| 105 | 00500 No approve | | 07087 file | SHANNON, J. MB- | 9 |
| 105 | 00917 No approve | | 02071 file | SHANNON -T- | 9 A |
| 105 | 00919 No approve | 7C d W-3X on | 02071 file | SHANNON -T- | 10A |
| 105 | 00983 No approve | 7C d W-3X on | 02071 file | SHANNON -T- | 3 A |
| 105 | 01468 No approve Must resol | d W-3X on | file | SHANNON, M. A. EST. -15 failure preventing 14(B)(2) a | 2 pproval |
| 105 | 01488 No approve | 7C d W-3X on | 02066 file | SHANNON, M. A. EST15 failure preventing 14(B)(2) a | 22 |
| 105 | 01592 No approve | 7C | 06055 | SHANNON -17- | 3 |
| 105 | 02060 No approve | | 07088 file | SHANNON -A- | 3 L |
| 105 | 02061 Electricit Surface eq No approve | y must be uipment mu | ist be remove | SHANNON -A- l (certify on Form W-3C) ed (certify on Form W-3C) | 4 |
| 105 | 02067 No approve | | | SHANNON -A- | 10 |
| 105 | 02069 No approve | 7C d W-3X on | 07087 file | SHANNON, J. MB- | 1 |
| 105 | 02070 No approve | | | SHANNON, J. MB- | 5 |
| 105 | 30279 No approve | 7C d W-3X on | 05990 file | SHANNON -18- | 1 = |
| 105 | 30318 No approve | 7C d W-3X on | 06055 file | SHANNON -17- | 1 |

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| API | Number Dia | strict | ID Number | Lease Name | Well Number |
|-----|----------------------|--------------------------|-----------------------------|--|-------------|
| 105 | 30483 No approved | 7C W-3X on | 06055 file | | 2 |
| 105 | 30772 No approved | 7C W-3X on | 07087 file | SHANNON, J. MB- | 15 |
| 105 | 31154 No approved | 7C W-3X on | 05990 file | SHANNON -18- | 2 |
| 105 | 31567 No approved | 7C W-3X on | 05990 file | SHANNON -18- | 3 |
| 105 | 31969 No approved | 7C W-3X on | 07087 file | SHANNON, J. MB- | 3 |
| 105 | 32017 No approved | 7C W-3X on | 07087 file | SHANNON, J. MB- | 25 |
| 105 | 32072 No approved | 7C W-3X on | 07087 file | SHANNON, J. MB- | 22 |
| 105 | 32096 No approved | 7C W-3X on | 07087 file | SHANNON, J. MB- | 21 |
| 105 | 32131 No approved | 7C W-3X on | 07087 file | SHANNON, J. MB- | 18 |
| 105 | 32903 No approved | 7C W-3X on | 06055 file | SHANNON -17- | 4 |
| 105 | 33010 No approved | 7C W-3X on | 07087 file | SHANNON, J. MB- | 16 |
| 105 | 34923 No approved | 7C W-3X on | 02052 file | SHANNON, J. M. ESTB- | 8 |
| 105 | 35164 No approved | 7C W-3X on | 02052 file | SHANNON, J. M. ESTB- | 4 |
| 105 | 35166 No approved | 7C W-3X on | 02052 file | SHANNON, J. M. ESTB- | 13 |
| 105 | No approved | 7C W-3X on UIC H-5 | 02052 file Test issue | SHANNON, J. M. ESTB- preventing 14(B)(2) approval | 12 |
| 105 | 35168 No approved | 7C W-3X on | 02066 file | SHANNON, M. A. EST. 15 failure preventing 14(B)(2) ap | 46 |
| | | 7C | 02066 | SHANNON, M. A. EST. | 47 |
| | 35174 No approved | 7C W-3X on | 02052 file | SHANNON, J. M. ESTB- | 33 |

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| API | Number Di | strict | ID Number | Lease Name | Well Number |
|-----|----------------------|-----------------|---------------|--|-------------|
| 105 | 35175 No approved | | 02052 file | SHANNON, J. M. ESTB- | 32 |
| 105 | 35176 No approved | | 02052 file | SHANNON, J. M. ESTB- | 26 |
| 105 | 35177 No approved | | 02052 file | SHANNON, J. M. ESTB- | 30 |
| 105 | 35178 No approved | | 02052 file | SHANNON, J. M. ESTB- | 27 |
| 105 | 35180 No approved | 7C l W-3X on | 02052 file | SHANNON, J. M. ESTB- | 29 |
| 105 | 35190 No approved | | 02052 file | SHANNON, J. M. ESTB- | 17 |
| 105 | 35191 No approved | | 02052 file | SHANNON, J. M. ESTB- | 18 A |
| 105 | 35193 No approved | | 02052 file | SHANNON, J. M. ESTB- | 20 |
| 105 | 35194 No approved | | | SHANNON, J. M. ESTB- | 19 |
| 105 | 35203 No approved | | 02052 file | SHANNON, J. M. ESTB- | 31 |
| 105 | 35208 No approved | | 02052 file | SHANNON, J. M. ESTB- | 37 |
| 105 | 35209 No approved | | 02052 file | SHANNON, J. M. ESTB- | 35 |
| 105 | 35210 No approved | 7C l W-3X on | 02052 file | SHANNON, J. M. ESTB- | 36 |
| 105 | No approved | l W-3X on | file | SHANNON, M. A. EST15 failure preventing 14(B)(2) app | 48 |
| 105 | 35227 No approved | 7C | 02052 | SHANNON, J. M. ESTB- | 10A |
| 105 | 35228 No approved | 7C l W-3X on | 02052 file | SHANNON, J. M. ESTB- | 14A |
| 105 | 35232 No approved | | 02052 file | SHANNON, J. M. ESTB- | 28 |
| 105 | 35235 No approved | 7C l W-3X on | 02066 file | SHANNON, M. A. EST. | 49 |

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| A | ΡI | Number Di | strict | ID Number | Lease Name | Well | Numbe |
|---|----|--|------------------|-------------------------------|--|------|------------|
| 1 | 05 | 35255 No approved | 7C W-3X on | 02052 file | SHANNON, J. M. ESTB- | | 3 A |
| 1 | 05 | 35256 No approved | | | SHANNON, J. M. ESTB- | | 11A |
| 1 | 05 | 35268 No approved | | | SHANNON, J. M. ESTB- | | 6 A |
| 1 | 05 | 35269 No approved | | | SHANNON, J. M. ESTB- | | 7 A |
| 1 | 05 | 35273 No approved | | 02052 file | SHANNON, J. M. ESTB- | | 9 A |
| 1 | 05 | No approved | W-3X on | file | SHANNON, J. M. ESTB- preventing 14(B)(2) approval | | 41 |
| | | Masc Tesoiv | e orc n | J lest issue | preventing 14(B)(2) approval | | |
| 1 | 05 | 35326 No approved | | 07087 file | SHANNON, J. MB- | | 43 |
| 1 | 05 | 35362 No approved | | 02066 file | SHANNON, M. A. EST. | | 6 A |
| 1 | 05 | 35381 No approved | | 12243 file | SHANNON "4" | | 5 |
| 1 | 05 | 35579 No approved | 7C W-3X on | 12607 file | SHANNON ESTATE "AC" | | 1 |
| 1 | 05 | 35615 No approved | | 12607 file | SHANNON ESTATE "AC" | | 2 |
| 1 | 05 | 80276 No approved | 7C W-3X on | 02051 file | SHANNON, J. M. ESTATE -A- | | 7 |
| 2 | 27 | 01006 Electricity Surface equ No approved | must be ipment m | disconnected ust be remove | TEX-HAN DOUTHIT d (certify on Form W-3C) ed (certify on Form W-3C) | | 5 |
| 3 | 17 | 31616 Surface equ No approved | ipment m | ust be remove | NAIL, J.H., SEC. 26 ed (certify on Form W-3C) | | 1 |

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